

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

C.A. No. 04-1923 (DPW)

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW McCOLLUM,
CHRISTOPHER HUGHES and THE FACEBOOK,
INC.,

Defendants.

CERTIFIED
COPY

VOLUME 1

VIDEOTAPED DEPOSITION OF CONNECTU LLC

BY CAMERON H. WINKLEVOSS

Boston, Massachusetts

Tuesday, August 9, 2005

9:44 a.m. to 6:27 p.m.

Reported by:

Jessica L. Williamson, RMR, RPR, CRR
Notary Public, CSR No. 138795

JOB NO. 36599

www.sarnoffcourtreporters.com

46 Corporate Park, Suite 100
Irvine, CA 92606

445 South Figueroa St., Suite 2950
Los Angeles, CA 90071

phone 877.955.3855
fax 949.955.3854



SARNOFF
Court Reporters and
Legal Technologies

10:13:22 1 Q. And what do you -- and who are the
10:13:25 2 developers you pay?
10:13:27 3 A. Currently we employ a fellow by the name of
10:13:30 4 Winston Williams in Seattle.
10:13:32 5 Q. And is he at Pacific Northwest Software?
10:13:36 6 A. Yes. Well, yes, he's part of Pacific
10:13:41 7 Northwest and -- yeah, he's part of that
10:13:46 8 group.
10:13:46 9 Q. Okay. And what is he doing?
10:13:47 10 A. He does a variety of tasks. I mean, it
10:13:49 11 depends what needs to be done on the site
10:13:51 12 and whatnot.
10:13:58 13 Q. Anyone else?
10:13:59 14 A. Currently, no.
10:14:01 15 Q. And is Winston Williams being paid on the
10:14:04 16 hour?
10:14:04 17 A. Right now Winston Williams is being paid on
10:14:09 18 an hour, yes.
10:14:11 19 Q. And what's his hourly rate?
10:14:12 20 A. I believe it is \$60 an hour.
10:14:18 21 Q. Now, you said that there is a non-equity
10:14:21 22 manager with ConnectU LLC. Who is that?
10:14:24 23 A. Maria Antonelli.
10:14:27 24 Q. And what is her role?
10:14:29 25 A. She takes care of all of the basically just

01:19:31	1	Q.	Extracted the information?
01:19:32	2	A.	ConnectU followed an open URL, "open" being
01:19:36	3		that it was accessible with not having to
01:19:41	4		use unauthorized access, it was accessible,
01:19:44	5		out in the open, and ConnectU followed those
01:19:46	6		URLs and was able to collect e-mail
01:19:50	7		addresses.
01:19:50	8	Q.	And who did that?
01:19:51	9	A.	Winston Williams.
01:19:52	10	Q.	Winston Williams did that? And when did he
01:19:55	11		do that?
01:19:56	12	A.	I believe he did it in the spring of this
01:19:58	13		year.
01:19:58	14	Q.	Were those e-mails ever used by ConnectU?
01:20:01	15	A.	I think we used some of them with the Social
01:20:06	16		Butterfly software.
01:20:06	17	Q.	And how were they used?
01:20:07	18	A.	If a friend used Social Butterfly and wanted
01:20:11	19		to invite their friends, then they could do
01:20:14	20		that with Social Butterfly. And they --
01:20:16	21	Q.	So when you -- once you had those e-mails,
01:20:20	22		did you -- well, what did you do with them?
01:20:22	23	A.	We just held them in a holding bin, and if a
01:20:29	24		user said, I would like to invite my friend,
01:20:31	25		well, we would just invite their friends.